

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NATIONAL EVENT SERVICES, INC.,	:	Civil Action No.: 2:21-cv-04423-GAM
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
NATIONAL FIRE & MARINE	:	
INSURANCE COMPANY;	:	
MEDPRO GROUP;	:	
PETER BEHNKE;	:	
EDGEWOOD HEALTH CARE ADVISORS;	:	
INTEGRO GROUP;	:	
EPIC INSURANCE BROKERS &	:	
ADVISORS;	:	
CRC GROUP;	:	
MAURIZIO BIANCHI, ADMINISTRATOR	:	
OF THE ESTATE OF MARCO BIANCHI, IN	:	
HIS OWN RIGHT, AND ON BEHALF OF	:	
DECEDENT'S NEXT OF KIN;	:	
ALEX BIANCHI;	:	
THE PHILADELPHIA EAGLES;	:	
LINCOLN FINANCIAL FIELD,	:	
	:	
Defendants.	:	
	:	
	:	

**NATIONAL FIRE & MARINE INSURANCE COMPANY AND MEDPRO GROUP'S
MOTION TO SEVER AND STAY BAD FAITH CLAIM**

Defendants National Fire & Marine Insurance Company (“NF&M”) and MedPro Group (“MedPro”), by and through their undersigned counsel, and pursuant to Federal Rule of Civil Procedure 21, hereby file the within Motion to Sever and Stay Bad Faith Claim.

For the reasons set forth in detail in the accompanying Brief in Support of Motion to Sever and Stay Bad Faith Claim, which is incorporated herein by reference, NF&M and MedPro respectfully request that this Honorable Court enter an order granting severance of the bad faith claim set forth in count III of Plaintiff's Complaint from the remaining claims in this action, and stay the severed bad faith claim pending conclusion of the declaratory judgment (count I) and

negligence (count II) claims in Plaintiff's Complaint. In the alternative, NF&M and MedPro respectfully requests that this Honorable Court grant bifurcation of the bad faith claim from the remaining claims in this action, and stay discovery of the bad faith claim pending conclusion of the declaratory judgment and negligence claims in Plaintiff's Complaint.

WHEREFORE, Defendants National Fire & Marine Insurance Company and MedPro Group respectfully requests that this Honorable Court enter the attached Order.

Dated: November 17, 2022

Respectfully submitted,

HOUSTON HARBAUGH, P.C.

/s/ R. Brandon McCullough
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **NATIONAL FIRE & MARINE INSURANCE COMPANY AND MEDPRO GROUP's MOTION TO SEVER AND STAY BAD FAITH CLAIM** was e-filed through the CM/ECF system, which will send notice to all counsel of record, this 17th day of November, 2022.

<p>James C. Haggerty, Esquire Dennis Coyne, Esquire Haggerty, Goldberg, Schleifer & Kupersmith, P.C. 1801 Market Street, Suite 1100 Philadelphia, PA 19103 jhaggerty@HGSKLawyers.com DCoyne@HGSKLawyers.com <i>(Attorney for Plaintiff, National Event Services, Inc.)</i></p>	<p>Allison B. Goldis, Esquire Cozen O'Connor 1650 Market Street, Suite 2800 Philadelphia, PA 19103 AGoldis@cozen.com</p> <p>Laura B. Dowgin, Esquire Melissa F. Brill, Esquire Cozen O'Connor 3 WTC, 175 Greenwich Street, 55th Floor New York, NY 10007 LDowgin@cozen.com MBrill@cozen.com</p> <p><i>(Attorneys Defendants Edgewood Partners Insurance Center d/b/a EPIC Insurance Brokers & Consultants, Edgewood Healthcare Advisors, LLC, Integro USA, Inc. and Peter Behnke)</i></p>
<p>Nicole C. Wixted, Esquire Jessica E. Loesing, Esquire Louise Bonner, Esquire Faegre Drinker Biddle & Reath LLP One Logan Square, Suite 2000 Philadelphia, PA 19103 nicole.wixted@faegredrinker.com jessica.loesing@faegredrinker.com louise.bonner@faegredrinker.com <i>(Attorney for CRC Insurance Services, Inc.)</i></p>	<p>Michael F. Barrett, Esquire Joseph G. DeAngelo, Esquire Michael Mongeluzzi, Esquire Barrett Deangelo 380 Beagle Road West Chester, PA 19382 michael@barrettdeangelo.com joe@barrettdeangelo.com mike@barrettdeangelo.com <i>(Attorney for Maurizio Bianchi, Administrator of the Estate of Marco Bianchi, Deceased, in his own right and on behalf of decedent's next of kin and Alex Bianchi)</i></p>

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